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NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

Robin Parker, Laparis Davis  
Plaintiffs,

v.

STATE OF TEXAS,  
TEXAS ATTORNEY GENERAL'S OFFICE,  
CHILDREN'S MEDICAL CENTER DALLAS AND CHILDREN'S MEDICAL CENTER PLANO,  
LEGAL AID OF NORTHWEST TEXAS,  
MEGAN NORDYKE,  
JUDGE LADEITRA ADKINS,  
JUDGE DENNISE GARCIA,  
ETHEL L. JERNIGAN,  
TIFFANY WHITE,  
LISA HARBOUR,  
SUSAN SYLVESTER,  
LAZAT SHANTA WILSON,  
SYLVESTER WILLIAM BROWN II  
Defendants.

Case No.: 3-25 CV 0592-X

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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## INTRODUCTION

### 1. Nature of the Action:

This is an action for compensatory and punitive damages, injunctive relief, and declaratory judgment under 42 U.S.C. § 1983, 18 U.S.C. § 241, 18 U.S.C. § 1201, 31 U.S.C. §§ 3729–3733 (False Claims Act), and related statutes. This action arises from systemic discrimination, civil rights violations, and a conspiracy to defraud federally funded programs including Medicaid, SSI, Food Stamps, and Section 8 Housing.

### 2. Whistleblower Allegations:

Plaintiff brings this action as a whistleblower under the False Claims Act, exposing a scheme by Defendants to fraudulently obtain financial incentives and reimbursements from federal programs by violating the rights of Plaintiff and her special needs daughter.

3. Demand for Relief:

Plaintiff seeks a **global settlement** of \$350 million for compensatory and punitive damages, policy changes within implicated organizations, ADA compliance reforms, and the establishment of a **special needs trust** to provide for her daughter's lifelong medical and educational needs.

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**JURISDICTION AND VENUE**

4. **Jurisdiction:**

This Court has jurisdiction pursuant to 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1343(a)(3) (civil rights), and the False Claims Act (31 U.S.C. §§ 3729–3733).

5. **Venue:**

Venue is proper in this judicial district under 28 U.S.C. § 1391(b), as the events giving rise to the claims occurred in **Dallas, Texas**, and Defendants are located and conduct business within this district.

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**PARTIES**

6. **Plaintiffs:**

Plaintiffs are residents of **Texas**, parents of a special needs child, and **whistleblowers** under the False Claims Act.

7. **Defendants:**

- **State of Texas:** Through the **Texas Attorney General's Office**, participated in discriminatory practices and financial misconduct.
- **Children's Medical Center Dallas and Plano:** Violated healthcare privacy laws, ADA compliance, and supported an unlawful custody arrangement.
- **Legal Aid of Northwest Texas:** Actively facilitated discriminatory practices and failed to advocate for Plaintiff's rights.
- **Individual Defendants:**
  - **Judge Ladeitra Adkins and Judge Dennise Garcia:** Demonstrated bias and failed to provide ADA accommodations during court proceedings.
  - **Ethel L. Jernigan:** As a retired social worker, violated healthcare

privacy laws and enabled fraudulent activities.

• **Tiffany White, Lisa Harbour, Susan Sylvester:** Represented the Texas Attorney General's Office and engaged in actions that contributed to the fraudulent scheme and discrimination.

• **Lazat Wilson and Sylvester Brown:** Perpetrated a scheme to defraud the government through custody manipulation and exploitation of federally funded programs.

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#### **Additional Factual Allegations: Fraudulent Access to Public Benefits and Failure to Accommodate Disabilities**

##### **Fraudulent Acquisition of Government Benefits in 2012**

In or about 2012, Defendant Lazat Shanta Wilson unlawfully obtained **public assistance benefits** for Plaintiff's minor daughter, E.D., by falsely holding herself out as the child's caretaker despite having no **legal custody or guardianship** rights. Specifically, Wilson applied for and received **Temporary Assistance for Needy Families (TANF)** cash benefits, **Supplemental Nutrition Assistance Program (SNAP)** food benefits, and **Medicaid** health coverage on E.D.'s behalf under false pretenses. At that time, Plaintiff was the child's sole legal parent and had **never relinquished custody** to Wilson; thus, Wilson **lacked standing or any lawful authority** to seek those benefits for E.D. This **fraudulent misrepresentation** to state agencies not only violated state and federal law but also set in motion unjust legal action against Plaintiff. Because Wilson obtained government benefits through fraud, the Texas Office of the Attorney General ("OAG") – which automatically intervenes to recoup public assistance via child support – **wrongfully opened a Title IV-D child support case** against Plaintiff and her husband. In short, Wilson's fraud triggered baseless child support proceedings treating Plaintiff as if she had abandoned or failed to support her child, when in fact any **deprivation of support** was caused by Wilson's own unlawful actions. The resulting OAG enforcement action, predicated entirely on Wilson's false benefit claim, was **improper and without legal foundation**, causing Plaintiff to be unjustly hauled into court and assessed child support obligations for a situation manufactured by Wilson's deceit.

##### **OAG's Failure to Investigate Wilson's Custody Status and Background**

From the outset of these proceedings, the **Texas OAG** failed to exercise due diligence and instead prioritized financial incentives under **Title IV-D of the Social Security Act** over the truth of E.D.'s custody situation. Upon **information and belief**, the OAG receives federal funding and performance incentives for aggressive child support enforcement, creating a **conflict of interest** that influenced its conduct in this case. Rather than verifying whether Wilson had any legal rights to E.D. or investigating the circumstances of her benefits application, OAG personnel (including Defendant **Tiffany White**, a Title IV-D prosecutor) **rubber-stamped Wilson's claims** and relentlessly pursued Plaintiff for support. The OAG opened and prosecuted a child-support enforcement action naming Wilson as the child's custodian **without ever confirming a court order granting Wilson custody**. This dereliction of duty ignored clear red flags: **Wilson had a lengthy criminal history** – including arrests or convictions for **violent offenses and fraud** (such as **attempted murder, assault, and drug-related crimes** spanning 1992–2021) – which should have raised serious concerns about her fitness and credibility. Had the OAG performed a basic background check or demanded proof of

legal custody, it would have discovered that Wilson's custody claim was illegitimate and that entrusting E.D. to her posed a grave risk. Instead, driven by the prospect of federal reimbursement and Title IV-D funds tied to collecting support, the OAG aided and abetted Wilson's scheme by initiating legal actions against Plaintiff and her husband as obligors. OAG attorneys and staff aggressively pursued child support payments from Plaintiffs – garnishing wages and threatening enforcement penalties – all while willfully turning a blind eye to Wilson's lack of legal custody and her disqualifying criminal background. This failure to investigate or act impartially amounted to a gross abuse of the public trust and denied Plaintiff fundamental fairness in the support proceedings.

#### **March 12, 2014: Emergency Custody Order Sought by Wilson and Subsequent Arrest**

On March 12, 2014, Defendant Lazat Wilson and Sylvester Brown attempted to obtain an emergency ex parte custody order in the 302nd Judicial District Court, Dallas County, Texas, pursuant to Texas Family Code §159.606. At that exact time, Plaintiff was already present at the Dallas County courthouse researching legal documentation in the law library, desperately seeking resources and assistance to prevent Wilson from unlawfully taking custody of her daughter. Plaintiff had repeatedly informed court officials and authorities about Wilson's ongoing fraudulent scheme, but her concerns had been systematically ignored.

While Plaintiff was conducting this research, the law librarian informed her that a custody hearing was simultaneously occurring on the fourth floor concerning her daughter. Plaintiff immediately went to the courtroom where Wilson was attempting to secure emergency custody without Plaintiff's knowledge or consent. Upon arriving, Plaintiff promptly informed the court bailiff of an active blue warrant (parole violation warrant) against Wilson. Acting swiftly upon Plaintiff's information, courthouse law enforcement arrested Wilson on the spot. Wilson was subsequently incarcerated on the outstanding warrant, exposing to the court her significant criminal history and pattern of deceit. Sylvester brown scurried out of the court room because he has nothing to do with the case but was also assisting in interference with child custody concerning E.D.

The court, recognizing Wilson's immediate incarceration and inability to proceed, informed Plaintiff to attend a subsequent hearing to formally resolve custody issues. This incident on March 12, 2014, demonstrates Plaintiff's diligent and persistent efforts to protect her child from Wilson's fraudulent and abusive actions, despite being repeatedly disregarded by the court system. Acting on this information, law enforcement arrested Wilson on the spot at the courthouse for her outstanding warrant. Despite Wilson's arrest – which underscored the serious legal and safety issues surrounding her – Judge Garcia did not return E.D. to her mother. Instead, in Plaintiff's presence, Judge Garcia attempted to place E.D. into foster care or other state custody, rather than reunite her with Plaintiff, the child's fit and available parent. This extreme measure disregarded Plaintiff's parental rights and deviated from the legal presumption that a parent has first priority to custody of their child over a non-parent.

#### **March 3, 2016: Default Judgment Entered Against Plaintiff During High-Risk Pregnancy**

On March 3, 2016, a critical custody hearing was scheduled concerning Plaintiff's daughter, E.D., in the 303rd Judicial District Court, Dallas County, Texas. At this time, Plaintiff was experiencing a high-risk pregnancy, which significantly impacted her ability to attend court. As of March 2, 2016, Plaintiff was 24 weeks pregnant and had been advised by her medical team to remain on strict bed rest. Due to the severity of her condition, a nurse visited Plaintiff's home weekly to administer steroid injections, including an injection the day before the scheduled hearing, to support her

pregnancy and reduce risks to the unborn child.

Despite these medical circumstances, Plaintiff was unable to secure **childcare for her other children** and could not physically attend the March 3, 2016 hearing. Although the court had been informed of Plaintiff's **medical condition and safety concerns**, Judge Dennise Garcia proceeded with the hearing in **absentia**. Without considering Plaintiff's legitimate **medical needs** or providing any **reasonable accommodation**, the court issued a **default judgment** against her, awarding custody to **Lazat Wilson** while incarcerated.

When Plaintiff attempted to follow up with the court, she learned that the **case file had been sealed**, restricting her access to crucial information about the default order. Court staff provided only minimal information through journal entries, which stated:

- "Mother did not appear, father unreachable, default granted to Wilson, subject to agreement with OAG to be proved up at a later date."
- The records did not acknowledge Wilson's previous incarceration or the circumstances of Plaintiff's absence, leading to a misleading and incomplete record.

Plaintiff was later contacted by **Tiffany White**, a representative of the **Texas Office of the Attorney General**, who attempted to coerce Plaintiff into signing a proposed order that would retroactively approve **Judge Garcia's ruling**. Despite Plaintiff's **objections and refusal to sign**, Judge Garcia openly declared, "**I don't care if you sign it, I'm signing it**," proceeding to formalize the order unilaterally on July 20, 2017.

The court's actions not only violated Plaintiff's due process rights but also failed to provide **reasonable accommodations** under the **Americans with Disabilities Act (ADA)**, as Plaintiff's **high-risk pregnancy and medical needs** were not considered in the **scheduling or conduct of the hearing**. The resulting **default order** contributed to a prolonged period of **custody interference**, emotional distress, and ongoing financial and legal harm to Plaintiff and her family.

#### **Judicial Misconduct and Coercion in 2017 Custody Proceedings**

Plaintiff's case reached a climax of irregularity and coercion during the final custody modification proceedings in 2017. After multiple continuances and procedural delays, a final hearing in Cause No. DF-13-00814 was held on May 24, 2017 in Judge Garcia's court to determine permanent conservatorship of E.D. Leading up to this hearing, Judge Garcia – in concert with OAG attorney Tiffany White and others – **pressured Plaintiff to sign a proposed custody order** that would award **permanent managing conservatorship** of E.D. to Wilson. This proposed order contained **false and fraudulent recitals** (including the fiction that Plaintiff had voluntarily relinquished her rights) which Plaintiff vehemently refused to endorse. In an act of judicial overreach, Judge Garcia responded by **improperly resurrecting a previously dismissed proceeding** to force the outcome: she **removed an "802 dismissal"** that had been entered (a dismissal for want of prosecution or expiration of time) in order to retain jurisdiction and push through Wilson's custody claims. During a court session, Judge Garcia made clear that Plaintiff's consent was irrelevant, telling her in open court: "**I don't care if you sign it, I'm signing it**." The judge then proceeded to sign a final **Order in Suit to Modify Parent-Child Relationship** (dated June 24, 2017) granting Wilson sole managing conservatorship of E.D. and ordering Plaintiff and her husband to pay monthly child support (\$173 from Plaintiff and \$186 from Mr. Davis). This final order was achieved through **coercion and procedural manipulation**, effectively depriving Plaintiff of a fair trial on the merits. It also **flouted**

Texas law designed to protect families: for example, no meaningful **background check or home study** was ever conducted on Wilson despite her known criminal history, contrary to the child's best interests and Tex. Fam. Code § 153.002 (which requires courts to ensure any conservatorship is in the **best interest of the child**). Immediately after securing this fraudulent custody order, Wilson **violated the terms of the order and Texas Family Code** by removing E.D. from Dallas County without court permission. The 2017 order (as is standard) either explicitly or implicitly required that the child's primary residence remain within the court's jurisdiction, yet Wilson **unilaterally relocated the child to Sherman, Texas** (Grayson County). This **extrajudicial move** not only defied the court's authority and the geographic restrictions on E.D.'s residence, but also deprived Plaintiff of the ability to exercise her visitation rights and maintain regular contact with her daughter. Judge Garcia and the OAG, despite knowing of Wilson's relocation in violation of the order, took **no prompt action to enforce compliance** or to safeguard Plaintiff's rights, leaving Wilson's misconduct unchecked. The 2017 proceedings thus were tainted by **judicial misconduct and conspiracy to deny Plaintiff a fair hearing**, resulting in an unjust order that emboldened Wilson to continue flouting the law.

#### **Failure to Accommodate Disabilities and Ongoing Harm to Child and Mother**

Defendants' actions not only violated Plaintiff's custodial rights but also **systematically failed to accommodate the disabilities** and special needs present in this family, in contravention of the Americans with Disabilities Act (ADA) and related laws. E.D. is a child with significant disabilities – including Down syndrome and Sickle Cell-Hemoglobin C disease – requiring coordinated medical care, therapy, and special education services. Yet, during the years that Wilson wrongfully held custody (2013–2020), E.D.'s **critical medical and developmental needs were neglected**. Wilson's fraudulent custody meant that she was the point of contact for E.D.'s healthcare, and she repeatedly **failed to secure timely treatment, therapy, and interventions** that E.D. needed. For example, important medical appointments were missed or delayed, and recommendations from specialists went unheeded, causing E.D.'s health to suffer. Plaintiff was ready and willing to manage her daughter's care, but was **prevented from doing so** by Wilson's interference and the court's orders. Defendant Children's Medical Center Dallas compounded this harm by unlawfully **restricting Plaintiff's parental rights** in the medical context. Relying on Wilson's apparent authority as managing conservator, the hospital and its staff (including Defendant Ethel Jernigan, a social worker) **excluded Plaintiff from medical decisions** regarding E.D. and at times refused to communicate with her about her daughter's condition. On one occasion, Children's Medical Center even **filed a baseless "medical neglect" report** against Plaintiff (the natural mother) at Wilson's urging – despite clear evidence that Plaintiff was not neglecting E.D., and that any lapses in E.D.'s care were due to Wilson's own neglect of the child's special needs. This improper action by the hospital **blocked Plaintiff from accessing E.D.'s medical information and advocating for her care**, effectively stripping away Plaintiff's rights as a parent to protect her disabled child. Such conduct violated **Title II of the ADA, 42 U.S.C. § 12132**, which prohibits public entities (and those acting in concert with them) from denying benefits or participation on the basis of disability. Here, E.D. was denied the benefit of having her **mother assist in her medical care and decision-making**, an accommodation that was necessary due to E.D.'s disabilities and Wilson's demonstrated inability to meet those needs. Furthermore, throughout the legal proceedings from **2013 through 2023**, the Texas courts and agencies involved **failed to provide reasonable accommodations** for the disabilities impacting the family. Plaintiff **repeatedly notified the courts and the OAG** of circumstances requiring accommodation – including her high-risk pregnancy in 2016 (a temporary disability affecting her ability to attend hearings) and the necessity to account for E.D.'s special needs in any custody arrangement – yet these pleas were **ignored or dismissed**. No modifications to schedules, formats (such as allowing remote participation for Plaintiff when she was hospitalized), or support services were offered to enable full and fair participation by the disabled

child or by Plaintiff as a mother managing her own medical challenges. By disregarding their ADA obligations, Defendants deprived both Plaintiff and E.D. of equal access to justice and services. The result was a series of court orders and institutional decisions that failed to protect a vulnerable child's well-being and exacerbated the emotional and physical strain on Plaintiff, who was left struggling to assert her rights without the accommodations needed to level the playing field. These failures directly contributed to the prolonged separation of mother and child, the deterioration of E.D.'s health, and the severe emotional distress endured by Plaintiff.

#### 2020 Contempt Ruling and Continued Financial Harm to Plaintiffs

It was not until 2020 – roughly eight years after Wilson's initial fraud – that the house of cards built on Wilson's lies began to collapse. In 2020, Plaintiffs (with the assistance of advocate **Tommy Carter**) brought Wilson's non-compliance with court orders to light and moved for enforcement of the 2017 custody order. The 303rd District Court (now with Judge **Ladeitra Adkins** presiding) found that Wilson was in contempt of court for her ongoing violations, which included refusing to facilitate Plaintiff's visitation with E.D. and illegally removing the child from the county. Faced with possible sanctions for contempt, Wilson finally relinquished physical custody of E.D. back to Plaintiff in or around 2020. This enforcement victory confirmed what Plaintiff had asserted all along – that Wilson was acting in bad faith and against the child's best interests – and it partially remedied the wrongful deprivation of Plaintiff's rights by restoring E.D. to her rightful home. However, even after E.D. was returned to her mother, Plaintiffs continued to suffer financial and legal harm from the aftermath of the fraudulent custody scheme. Despite the change in physical custody, the prior support orders against Plaintiff and her husband were not immediately vacated. Plaintiffs were still being treated as obligors under the defunct 2017 order, including an obligation for medical support payments (money intended to cover E.D.'s health insurance and medical expenses) that no longer made sense once E.D. was back under Plaintiff's care. When Plaintiffs petitioned the court to terminate these support obligations and formally recognize the custody reversal, Judge Adkins wrongfully refused to grant full relief. Instead, Judge Adkins upheld the requirement that Plaintiffs continue paying child support and medical support arrears that had accrued during Wilson's tenure – effectively penalizing Plaintiffs financially for the very period that Wilson wrongfully kept their child. Even more egregious, Judge Adkins ordered that Wilson would retain court-ordered visitation rights with E.D., despite Wilson's proven misconduct and contemptuous behavior. In other words, the court rewarded the wrongdoer by allowing Wilson ongoing access to the child and a continued stream of support-related funds, while Plaintiffs – who had finally regained their daughter – were forced to finance the arrangement and endure ongoing intrusion by Wilson. This state of affairs has inflicted continuing economic harm on Plaintiffs (in the form of unnecessary support payments and legal expenses) and emotional harm in requiring them to facilitate contact with the individual who defrauded them and endangered their child. The failure of the court to promptly correct the support orders and visitation in light of Wilson's contempt underscores the systemic biases and procedural failures at play. Plaintiffs were entitled to relief once the fraud was exposed and their rights vindicated, yet they have been made to suffer additional losses even post-2019/2020, in blatant disregard of principles of equity and justice.

In summary, the above additional factual allegations demonstrate a pattern of fraud, abuse of process, and disregard for civil rights that underpins Plaintiffs' claims.

Wilson's initial welfare fraud and unlawful custody grab set off a chain reaction of due process violations, as state actors (the OAG and judiciary) elevated financial interests and expediency over the rule of law. Throughout the protracted litigation, Defendants ignored or violated obligations under the U.S. Constitution and the ADA, failing to protect a disabled child's welfare or accommodate legitimate disabilities, and instead

persecuting the fit parents who sought only to care for their daughter. As a direct result of these factual circumstances, Plaintiffs have suffered egregious harm – including the loss of companionship with their child, out-of-pocket financial losses, emotional distress, and denial of their civil rights – for which they now seek redress in this Court.

#### LEGAL CLAIMS WITH SPECIFIC STATUTES AND CASE LAW

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##### COUNT I: VIOLATION OF THE AMERICANS WITH DISABILITIES ACT (ADA) (42 U.S.C. § 12132)

(Against All Defendants)

1. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

2. Under Title II of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12132, and its implementing regulations at 28 C.F.R. Part 35, **public entities** must not discriminate against individuals with disabilities and must provide reasonable accommodations to ensure equal access to programs and services.

3. Plaintiff's daughter, E.D., is a qualified individual with a disability under the ADA due to Down syndrome and Sickle Cell-Hemoglobin C disease, which substantially limit major life activities, including learning, communication, and health management. Plaintiff's high-risk pregnancy in 2016 also constituted a temporary disability, entitling her to reasonable accommodations during court proceedings.

4. Defendants, including Judge Denise Garcia, Judge Ledetra Atkins, Tiffany White, and Children's Medical Center Dallas, failed to provide reasonable accommodations, violating the ADA by:

- Denying E.D. access to appropriate medical care and educational services.
- Failing to modify court procedures to accommodate Plaintiff's pregnancy-related disabilities, as mandated by *Tennessee v. Lane*, 541 U.S. 509 (2004), where the Supreme Court held that courts must provide accommodations for disabled individuals to participate fully in legal proceedings.
- Refusing to consider E.D.'s special needs in all court orders and custody determinations, a violation of *Olmstead v. L.C.*, 527 U.S. 581 (1999), which emphasizes community-based treatment and accommodations under the ADA.

5. As a result, Plaintiff and E.D. were denied access to essential services, causing substantial harm, including emotional distress, financial loss, and continued exposure to discrimination.

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COUNT II: VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983

(Against Governmental Defendants and Associated Individuals)

6. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

7. 42 U.S.C. § 1983 provides a civil action for the **deprivation of constitutional rights under color of state law**. Defendants, acting under color of state law, engaged in conduct that deprived Plaintiff and her daughter of their **constitutional rights**, including:

- **Denial of Due Process Rights (Fourteenth Amendment)** by issuing default judgments without proper notice, accommodation, or opportunity to be heard, violating principles set forth in **Goldberg v. Kelly**, 397 U.S. 254 (1970).
- **Violation of Equal Protection Rights** by failing to treat Plaintiff and E.D. equally, as required by **City of Cleburne v. Cleburne Living Center**, 473 U.S. 432 (1985), which prohibits discriminatory treatment of disabled individuals.
- **Conspiracy Against Rights** under 18 U.S.C. § 241, wherein Defendants colluded to maintain fraudulent custody orders favoring Wilson, despite her criminal history and lack of legal standing, demonstrating a **conspiracy to violate civil rights** under **Dennis v. Sparks**, 449 U.S. 24 (1980).

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COUNT III: VIOLATION OF THE FALSE CLAIMS ACT (31 U.S.C. § 3729)

(Against Lazat Wilson, Texas Attorney General's Office, and Legal Aid of Northwest Texas)

8. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

9. The **False Claims Act (FCA)** prohibits the **presentation of false claims** to the federal government for **payment or approval**. Defendants knowingly participated in **false claims** by:

- Submitting **false information** to obtain TANF, SNAP, and Medicaid benefits without legal custody of E.D.
- Facilitating fraudulent **child support actions** through **false representations** and **conspiring to defraud federal programs**, violating **United States ex rel. Marcus v. Hess**, 317 U.S. 537 (1943).
- The **Texas Attorney General's Office** enabled these violations by **pursuing financial incentives under Title IV-D**, prioritizing **financial reimbursement** over legal and ethical responsibilities.

10. Plaintiff, acting as a **whistleblower**, is entitled to protection under 31

U.S.C. § 3730(h) and seeks relief under the FCA's **qui tam** provisions, including treble damages, civil penalties, and recognition as a **federal whistleblower**.

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#### COUNT IV: FRAUD AND MISREPRESENTATION

(Against Lazat Wilson and Collaborating Defendants)

11. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

12. **Lazat Wilson**, along with **Ethel Jernigan, Tiffany White**, and **Legal Aid of Northwest Texas**, engaged in **common law fraud** by:

- Making false statements and representations to obtain public assistance benefits and custody orders.
- Submitting fraudulent documents to the courts and state agencies, violating principles in **Doe v. Boys Clubs of Greater Dallas, Inc.**, 907 S.W.2d 472 (Tex. 1995).
- Concealing material facts, including Wilson's criminal background, from the court, resulting in harmful and unjust outcomes for Plaintiff and her daughter.

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#### COUNT V: INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

(Against All Defendants)

13. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

14. Defendants' conduct, including:

- The unlawful removal of Plaintiff's daughter,
- The coercive legal actions and fraudulent child support orders, and
- The denial of ADA accommodations,

constituted **extreme and outrageous behavior**, causing **severe emotional distress** to Plaintiff, in line with **Twyman v. Twyman**, 855 S.W.2d 619 (Tex. 1993).

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#### CRIMINAL PROSECUTION REQUESTS

Plaintiff formally requests that the **Department of Justice (DOJ)** and **Federal Bureau of Investigation (FBI)** investigate potential criminal violations, including:

- Perjury (18 U.S.C. § 1621) for false testimony and affidavits submitted to the court.
- Wire Fraud (18 U.S.C. § 1343) and Benefit Fraud (18 U.S.C. § 641) for misappropriating federal funds through Title IV-D programs.
- Conspiracy Against Rights (18 U.S.C. § 241) for colluding to deny Plaintiff's civil rights through fraudulent custody and support orders.
- Kidnapping via Custody Interference (18 U.S.C. § 1201) for removing E.D. from the jurisdiction without court authorization.

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#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter a judgment in her favor and against Defendants, including:

- Compensatory and punitive damages totaling \$350 million.
- Treble damages and statutory penalties under the False Claims Act.
- Injunctive relief to mandate policy changes and training within the Texas Attorney General's Office, Legal Aid of Northwest Texas, and Children's Medical Center Dallas.
- An order establishing a Special Needs Trust for E.D., ensuring financial stability and protection of her disability benefits.
- Recognition of Plaintiff as a federal whistleblower, including financial incentives provided under the FCA's qui tam provisions.
- Attorney's fees, costs of litigation, and any other relief deemed just and proper.

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469-879-4147

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Robin Bay-wan Parker  
Laparis Davis.

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

Emorie Davis (minor)

(c) Attorneys (Firm Name, Address, and Telephone Number)

PRO-SE

## DEFENDANTS

The state of Texas, et al

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

3-25 CV 0592-X

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

 1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party) 2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

PTF DEF PTF DEF

Citizen of This State

 1 1

Incorporated or Principal Place of Business In This State

 4 4

Citizen of Another State

 2 2

Incorporated and Principal Place of Business In Another State

 5 5

Citizen or Subject of a Foreign Country

 3 3

Foreign Nation

 6 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> PERSONAL INJURY	<input checked="" type="checkbox"/> 422 Appeal 28 USC 158	<input checked="" type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<b>INTELLECTUAL PROPERTY RIGHTS</b>	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 355 Motor Vehicle	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 385 Property Damage	<b>SOCIAL SECURITY</b>	<input checked="" type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 388 Product Liability	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
			<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
			<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
				<input type="checkbox"/> 893 Environmental Matters
				<input type="checkbox"/> 895 Freedom of Information Act
				<input type="checkbox"/> 896 Arbitration
				<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<b>Habeas Corpus:</b>		
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee		
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence		
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General		
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	<b>FEDERAL TAX SUITS</b>	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<b>Other:</b>	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 871 IRS—Third Party	
		<input type="checkbox"/> 550 Civil Rights	26 USC 7609	
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

## V. ORIGIN (Place an "X" in One Box Only)

 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 USC 1983, 42 USC 654, 14th amendment

Brief description of cause:

Seeking damages for civil rights violations, HIPAA breaches, Fraud + conspiracy

## VI. CAUSE OF ACTION

 CHECK IF THIS IS A CLASS ACTION  
UNDER RULE 23, F.R.Cv.P.

## DEMANDS

\$350,000,000

CHECK YES only if demanded in complaint:

JURY DEMAND:  Yes  No

## VII. REQUESTED IN COMPLAINT:

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

Ladittra Adkins

DOCKET NUMBER

DF-13-00814

DATE

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE